

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MICHAEL J. BOST, et al.,

Plaintiffs,

v.

THE ILLINOIS STATE BOARD OF  
ELECTIONS, et al.,

Defendants.

Civil Action No. 1:22-cv-2754

**DECLARATION OF SUSAN SWEENEY**

I, Susan Sweeney, declare as follows:

1. I am a resident of Cook County, Illinois and a plaintiff in this lawsuit.
2. I am registered to vote in Cook County and have voted regularly in federal elections since 2004. I intend to vote in the November 8, 2022 and November 5, 2024 federal elections.
3. I am active in Republican elections, the Illinois Republican Party, Republican organizations and campaigns.
4. During the 2020 federal general election, I served as a Republican nominee for presidential and vice-presidential elector at-large for Illinois.
5. As a volunteer, I have assisted the Illinois Republican Party and its federal and state candidates both before and after Election Day.
6. I am serving as a Precinct Captain for the Republican Party of Maine Township, Illinois during the November 8, 2022, congressional elections.

7. As Precinct Captain, I will act as a poll watcher both before, during, and after Election Day. Among other things, I will monitor the canvassing of ballots and look for any abnormalities, which I may report to election attorneys for the Republican Party or campaigns.

8. I have previously volunteered in other ways. For example, from 2014 to 2018, I was the Deputy Committeeman for the Illinois Republican State Central Committee for the 9<sup>th</sup> Congressional District. One of my duties in that capacity included selecting committees for the state convention, including the at-large delegates and presidential and vice-presidential electors. After each Election Day, I monitored daily canvassing reports posted by the Cook County Board of Elections.

9. Additionally, I previously served as Republican Deputy Committeeman for Maine Township, Illinois. As Deputy Committeeman for the Township, I was part of a team that recruited and trained different election volunteers (*e.g.*, precinct captains) and organized our election reporting operations. This work required many hours of work and funding. I helped plan and host fundraisers that funded our Election Day activities. We also worked to find other volunteers. It has gotten more difficult to find volunteers because Illinois' Receipt Deadline requires monitoring of incoming ballots fourteen days after Election Day.

10. As part of these Election Day activities, we tracked and monitored incoming vote counts for local and federal campaigns, including vote counts during the fourteen days following Election Day. During this time, I also fielded calls from poll watchers about possible irregularities and anomalies at poll sites.

11. I also served as President of Illinois Republican Women of Park Ridge from 2014-2018. Among other things, my job as president included overseeing our organization's efforts to support candidates either financially or by providing volunteers.

12. During the November 3, 2020, federal election, I volunteered with the Illinois Republican Party monitoring post-election activities. In the two weeks following Election Day, I monitored daily reports regarding late-arriving ballots. I fielded numerous concerns regarding possible irregularities or anomalies. My work during this time often involved talking to election staff, poll watchers, and people involved with the post-election activities. The information I compiled from those reports was passed on to the Illinois Republican Party and campaigns.

13. I even attempted to watch the post-election canvassing inside the Cook County Board of Elections facility in Cicero, Illinois during the 2020 election. But poll watching during the canvass, including watching the processing of late-arriving ballots, was very restricted.

14. In 2020, I was also a Republican nominee for presidential and vice-presidential elector at-large for Illinois. In my role as an elector nominee, I campaigned and monitored Election Day activities on behalf of my own candidacy in that federal election.

15. I plan to be similarly involved during the November 8, 2022, congressional elections.

16. During the November 3, 2020, federal election, I voted in person on Election Day.

17. By counting untimely votes and those received in violation of the federal Election Day deadline, Illinois substantially increases the pool of total votes cast and dilutes the weight of my timely casted vote. More votes will be counted than the law allows to be counted, resulting in dilution of my vote.

18. Because Illinois' receipt deadline holds voting open two additional weeks after Election Day, I am concerned that it gives bad actors, regardless of their political affiliation, more time to better target and affect close elections, including the election for the appointment of presidential and vice-presidential electors.

19. For all of these reasons, I am harmed by the provisions of Illinois law that allow the canvassing of vote-by-mail ballots received after Election Day.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Dated: July 15, 2022

  
SUSAN SWEENEY